



U.S. Department of Justice

United States Attorney Southern District of New York

The Silvio J. Mollo Building One Saint Andrew's Plaza New York, New York 10007

October 12, 2022

BY ECF

Honorable Ronnie Abrams United States District Judge Southern District of New York Thurgood Marshall U.S. Courthouse 40 Foley Square New York, New York 10007

Re: United States v. Niloufar Bahadorifar et al.,

S1 21 Cr. 430 (RA)

Dear Judge Abrams:

The Government respectfully submits this status letter with respect to the conference scheduled for October 14, 2022. The Government has conferred with counsel for the defendant, and the parties propose to adjourn the conference for approximately 30 days. The parties have been engaged in discussions about a possible resolution of this matter. (*See* Dkt. No. 37). The primary purpose of the proposed adjournment is to continue those discussions with the expectation that, within approximately the next 30 days, the parties will be able to advise the Court whether the parties have reached a disposition or, if not, to request that the Court set a motions schedule.

Should the request be granted, the Government requests that time be excluded under the Speedy Trial Act until the date of the adjourned conference. Defense counsel consents to this request. The ends of justice served by the requested exclusion outweigh the best interests of the public and the defendant in a speedy trial because it will permit the defendant and her counsel time to review discovery, to consider potential pretrial motions, and to consider a potential disposition of the matter. See 18 U.S.C. § 3161(h)(7).

	Respectfully submitted,
	DAMIAN WILLIAMS United States Attorney
Ву:	/s/ Michael D. Lockard / Matthew J.C. Hellman / Jacob H. Gutwillig Assistant United States Attorneys (212) 637- 2193 / 2278 / 2215

cc: Counsel of record (by ECF)